

U.S. Department of Justice

United States Attorney Eastern District of New York

MAA/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

March 11, 2024

By Email and ECF

Mark D. Hopson Michael A. Levy Douglas A. Axel Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Matthew D. Cipolla Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Records regarding the Professor.	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0122375085 - DOJ_HUAWEI_A_0122383664
Records regarding Company 1.	SDM	DOJ_HUAWEI_A_0122383665 - DOJ_HUAWEI_A_0122384489
Records regarding Company 4.	SDM	DOJ_HUAWEI_A_0122384490 - DOJ_HUAWEI_A_0122399768
Records regarding the Professor.	SDM	DOJ_HUAWEI_A_0122399769 – DOJ_HUAWEI_A_0122399785
Records regarding the Professor.	Discovery Material ("DM")	DOJ_HUAWEI_A_0122399786 - DOJ_HUAWEI_A_0122409679
Records regarding Company 1.	DM	DOJ_HUAWEI_A_0122409680 - DOJ_HUAWEI_A_0122410626
Records regarding Company 3.	DM	DOJ_HUAWEI_A_0122410627 - DOJ_HUAWEI_A_0122410631
Records regarding Company 4.	DM	DOJ_HUAWEI_A_0122410632 - DOJ_HUAWEI_A_0122414115

Very truly yours,

BREON PEACE United States Attorney Eastern District of New York

By: /s/ Meredith A. Arfa

Alexander A. Solomon Meredith A. Arfa Robert Pollack

Assistant United States Attorneys

(718) 254-7000

MARGARET A. MOESER Acting Chief, Money Laundering and Asset Recovery Section, Criminal Division U.S. Department of Justice

By: /s/ Laura Billings

Laura Billings
Jasmin Salehi Fashami
Taylor Stout
Trial Attorneys

JENNIFER KENNEDY GELLIE
Acting Chief, Counterintelligence and
Export Control Section
National Security Division, U.S. Department
of Justice

By: /s/ David Lim

David Lim Christian Nauvel Yifei Zheng Garrett Coyle Trial Attorneys